IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

: Case No.: 24-13083

Piotr Modzelewski : Chapter 7

Judge Ashely M. Chan

Debtor(s) : *************

:

U.S. Bank National Association : Date and Time of Hearing

Movant, : Place of Hearing

vs : January 15, 2025 at 12:30 p.m.

:

Piotr Modzelewski : U.S. Bankruptcy Court

ROBERT W. SEITZER : 900 Market Street, Suite 400, Courtroom

Respondents. : #4

: Philadelphia, PA, 19107

CERTIFICATION OF NO OBJECTION REGARDING MOTION FOR RELIEF FROM THE AUTOMATIC STAY TO PERMIT U.S. BANK NATIONAL ASSOCIATION TO REPOSSESS THE 2022 TELSA MODEL Y WITH THE VEHICLE IDENTIFICATION NUMBER 7SAYGDEF4NF462981 (DOCUMENT NO. 27)

The undersigned hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading to the Motion for Relief from the Automatic Stay ("Motion") filed on December 16, 2024, at Document No. 27 has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of Hearing, objections to the Motion were to be filed and served no later than December 31, 2024.

It is hereby respectfully requested that the Order attached to the Motion be entered by the Court.

/s/Stephen R. Franks

Stephen R. Franks, Esquire (333394)

Adam B. Hall (323867)

MDK Legal

P.O. Box 165028

Columbus, OH 43216-5028 Telephone: 614-220-5611

Fax: 614-627-8181 Attorneys for Creditor The case attorney for this file is Stephen R. Franks. Contact email is srfranks@mdklegal.com

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: 900 Market Street, Suite 400, Courtroom

Respondents. : #4

: Philadelphia, PA, 19107

CERTIFICATE OF SERVICE

I certify that on the date of filing, a copy of the foregoing Certificate of No Objection Regarding Motion for Relief from the Automatic Stay to Permit U.S. Bank National Association to Repossess the 2022 Telsa Model Y with the Vehicle Identification Number 7SAYGDEF4NF462981 (Document No. 27) was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

ROBERT W. SEITZER, Chapter 7 Trustee, rseitzer@karalislaw.com

PAUL H. YOUNG, Attorney for Piotr Modzelewski, support@ymalaw.com

I certify that on the date of filing, a copy of the foregoing document was sent by U.S.

Mail to the following:

Piotr Modzelewski, 28 Ruthies Way, Chalfont, PA 18914

/s/Stephen R. Franks